

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING,)	
ALABAMA, LLC; HYUNDAI ENG)	
AMERICA, INC.; and DYNAMIC)	
SECURITY, INC.)	
)	
)	
Defendants.)	

EXHIBIT C TO

**PLAINTIFF'S OBJECTIONS TO HYUNDAI MOTOR MANUFACTURING,
ALABAMA, LLC'S DEPOSITION DESIGNATIONS**

CASSANDRA WILLIAMS

Case	Key, Davita
Issue Code	HMMA Designation

WILLIAMS, CASSANDRA 9/6/22 VOL 1			
1	015:17 - 015:19	015:17	MS. BROWN: Object to form.
		18	MR. MILLER: Object to form.
		19	Q. You can answer.
2	024:05 - 024:05	024:05	MS. BROWN: Object to form.
3	024:11 - 024:11	024:11	MS. BROWN: Object to form.
4	030:08 - 030:15	030:08	Q. Have you seen anything related to
		09	employment discrimination from HEA?
		10	A. Only our handbook.
		11	Q. Who gets the handbook?
		12	A. HEA employees.
		13	Q. And so in Alabama would it be the five
		14	people we looked at on Plaintiff's Exhibit 62?
		15	A. Yes.
5	033:06 - 033:07	033:06	MS. BROWN: Object to form.
		07	MR. MILLER: Object to form.
6	034:23 - 034:23	034:23	MS. BROWN: Object to form.
7	035:04 - 035:04	035:04	MS. BROWN: Object to form.
8	035:11 - 035:12	035:11	MS. BROWN: Object to form.
		12	MR. MILLER: Object to form.
9	035:14 - 035:17	035:14	Q. Did HMMA ever make any requests to you to
		15	remove somebody from Dynamic Security from the
		16	property?
		17	A. Not that I recall.
10	036:03 - 036:03	036:03	MS. BROWN: Object to form.
11	036:07 - 036:08	036:07	MS. BROWN: Object to form.
		08	MR. MILLER: Object to form.
12	037:06 - 037:06	037:06	MS. BROWN: Object to form.
13	037:13 - 037:14	037:13	MR. MILLER: Object to form.
		14	MS. BROWN: Object to form.
14	042:23 - 042:23	042:23	MS. BROWN: Object to form.
15	045:03 - 045:04	045:03	A. No one reviewed with HMMA -- HMMA reviewed
		04	it.
16	045:17 - 045:18	045:17	MR. MILLER: Object to form.

		18	MS. BROWN: Object to form.
17	046:01 - 046:03	046:01	MS. BROWN: Object to form.
		02	MR. MILLER: Object to form.
		03	MR. REDMOND: Same objection.
18	050:03 - 050:05	050:03	MS. BROWN: Object to form.
		04	MR. MILLER: Object to form.
		05	MR. REDMOND: Same objection.
19	051:10 - 051:15	051:10	Q. What was Ms. Howard's race?
		11	A. Black.
		12	Q. An what was Ms. Walton's race?
		13	A. Miss who?
		14	Q. Walton.
		15	A. Black.
20	052:08 - 052:08	052:08	MS. BROWN: Object to form.
21	055:13 - 055:14	055:13	MR. MILLER: Object to form.
		14	MS. BROWN: Object to form.
22	055:20 - 055:21	055:20	MS. BROWN: Object to form.
		21	MR. MILLER: Object to form.
23	056:04 - 056:05	056:04	MS. BROWN: Object to form.
		05	MR. MILLER: Object to form.
24	058:10 - 058:10	058:10	MS. BROWN: Object to form.
25	058:19 - 058:19	058:19	MS. BROWN: Object to form.
26	061:22 - 061:22	061:22	MS. BROWN: Object to form.
27	062:07 - 062:07	062:07	MS. BROWN: Object to form.
28	062:11 - 062:11	062:11	MS. BROWN: Object to form.
29	063:05 - 063:07	063:05	Does that legal department provide
		06	services to HEA?
		07	A. No.
30	066:07 - 066:08	066:07	MS. BROWN: Object to form.
		08	A. I honestly don't...
31	066:12 - 066:12	066:12	MS. BROWN: Object to form.
32	066:17 - 066:18	066:17	MS. BROWN: Object to form.
		18	MR. MILLER: Object to form.
33	067:14 - 067:14	067:14	MS. BROWN: Object to form.
34	068:20 - 068:20	068:20	MS. BROWN: Object to form.
35	069:15 - 069:16	069:15	MS. BROWN: Object to form.
		16	MR. MILLER: Object to form.

36	069:19 - 069:19	069:19	MS. BROWN: Object to form.
37	070:11 - 070:11	070:11	MS. BROWN: Object to form.
38	070:15 - 070:18	070:15	identifies her with the word "Hyundai"?
		16	MS. BROWN: Object to form.
		17	MR. MILLER: Object to form.
		18	MR. REDMOND: Same objection.
39	071:01 - 071:05	071:01	Q. So you always wear a shirt that says
		02	"Hyundai Engineering"?
		03	A. Yes.
		04	Q. Was that the case in 2017?
		05	A. Yes.
40	071:13 - 072:02	071:13	Q. Who set Ms. Key's rate of pay?
		14	A. Dynamic Security.
		15	Q. When we look at Plaintiff's Exhibit 20, it
		16	says in here the pay is \$13 per hour.
		17	If Dynamic Security set that rate of pay,
		18	why did you put that in Plaintiff's Exhibit 20?
		19	A. This is a job announcement.
		20	Q. Okay. Is the rate of pay for the position
		21	set through -- was it controlled by the scope of
		22	services agreement?
		23	A. It was in their bid.
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		072:01	Q. Okay. And who accepted the bid?
		02	A. HEA accepted the bid.
41	076:04 - 076:05	076:04	MR. MILLER: Object to form.
		05	MS. BROWN: Object to form.
42	076:22 - 076:23	076:22	MR. MILLER: Object to form.
		23	MS. BROWN: Object to form.
43	080:11 - 080:11	080:11	MS. BROWN: Object to form.
44	080:13 - 080:13	080:13	MR. MILLER: Object to form.
45	082:09 - 082:10	082:09	MS. BROWN: Object to form.
		10	MR. MILLER: Object to form.
46	082:14 - 082:14	082:14	MS. BROWN: Object --
47	082:21 - 082:22	082:21	MS. BROWN: Object to form.
		22	MR. MILLER: Object to form.
48	083:11 - 083:14	083:11	MR. MILLER: Object to form.
		12	MS. BROWN: Object to form.

		13	MR. MILLER: She can answer.
		14	MR. REDMOND: Same objection.
49	083:21 - 083:22	083:21	MS. BROWN: Object to form.
		22	MR. MILLER: Object to form.
50	084:10 - 084:19	084:10	Q. Okay. You said an agreement was reached.
		11	Were you a party to this agreement
		12	concerning how Ms. Key would style her hair?
		13	A. Yes. I was in there when she agreed to do
		14	it.
		15	Q. Tell me what you know of that agreement.
		16	A. It was a verbal agreement. She stated --
		17	after I said "Yes, this is acceptable" and she
		18	stated that's the way she would have her hair done
		19	when she returned.
51	085:18 - 085:21	085:18	Q. How far is the security building from the
		19	administration building? Are they next to each
		20	other? Are they connected?
		21	A. No. It's, like, across campus.
52	086:03 - 086:12	086:03	Q. Is this the building where employees go to
		04	get their badge?
		05	A. It is.
		06	Q. Who issues the badges?
		07	A. The receptionist, me, sometimes dispatch
		08	if we're short.
		09	Q. And who does the receptionist work for?
		10	A. The security company.
		11	Q. And who does dispatch work for?
		12	A. The security company.
53	087:08 - 087:09	087:08	MS. BROWN: Object to form.
		09	MR. MILLER: Object to form.
54	089:01 - 089:01	089:01	MS. BROWN: Object to form.
55	089:16 - 089:18	089:16	MR. MILLER: You're saying the agreement
		17	was not signed -- had not been signed?
		18	THE WITNESS: It was not signed.
56	092:23 - 092:23	092:23	A. All the time.
57	093:01 - 093:01	093:01	MS. BROWN: Object to form.
58	096:11 - 096:13	096:11	MS. BROWN: Object to the form.
		12	MR. MILLER: Object to the form.
		13	MR. REDMOND: Object to form.

59	099:16 - 099:16	099:16	A. I have no idea.
60	100:19 - 100:20	100:19 20	MR. MILLER: Object to form. MR. REDMOND: Same objection to form.
61	100:23 - 100:23	100:23	MS. BROWN: Object to form.
62	105:12 - 105:12	105:12	MS. BROWN: Object to form.
63	105:21 - 105:21	105:21	MS. BROWN: Object to form.
64	106:14 - 106:15	106:14 15	MS. BROWN: Object to form. MR. MILLER: Object to form.
65	108:12 - 108:12	108:12	MS. BROWN: Object to form.
66	108:15 - 108:18	108:15 16 17 18	Q. Okay. Were there any guidelines or instructions from HMMA as to what you could or could not have in your signature line? A. If there was, it wasn't shared with me.
67	109:03 - 109:03	109:03	MS. BROWN: Object to form.
68	109:10 - 109:10	109:10	MS. BROWN: Object to form.
69	109:12 - 109:19	109:12 13 14 15 16 17 18 19	Q. Did anyone tell you to put in there where your assignment was? A. No. I chose to do it. Q. Did anyone tell you to use the "Team Built, Team Strong" HMMA logo -- A. No. Q. -- in your signature? A. That was my decision.
70	111:06 - 111:07	111:06 07	MR. MILLER: Object to the form. MS. BROWN: Object to the form.
71	111:13 - 111:13	111:13	MS. BROWN: Object to form.
72	112:11 - 112:12	112:11 12	MS. BROWN: Object to the form. MR. MILLER: Object to the form.
73	146:11 - 146:13	146:11 12 13	Q. Did any employee of HMMA ask that Ms. Key be removed from its site? A. They did not.
74	147:11 - 149:06	147:11 12 13 14 15 16 17 18	And keeping on 9 and 63, I want to be sure that I'm clear. You are the author of Plaintiff's Exhibit 9; correct? A. And 63, yes. Q. Yeah. I want to ask them separately because of the -- A. Oh, I'm sorry. Q. -- the formalities.

		<p>19 You are the author of Plaintiff's</p> <p>20 Exhibit 9; correct?</p> <p>21 A. Correct.</p> <p>22 Q. And no one from HMMA specifically had to</p> <p>23 approve Plaintiff's Exhibit 9; correct?</p> <p>ALABAMA COURT REPORTING, INC.</p> <p>www.alabamareporting.com 877.478.DEPO (3376)</p> <p>148:01 A. Correct.</p> <p>02 Q. And you're the author of Plaintiff's</p> <p>03 Exhibit 63; correct?</p> <p>04 A. Correct.</p> <p>05 Q. And no one from HMMA had to approve that</p> <p>06 before it went into effect; correct?</p> <p>07 A. Correct.</p> <p>08 Q. Your project manager, does he have a</p> <p>09 direct report within HEA?</p> <p>10 A. A direct report?</p> <p>11 Q. Yeah, and who does he directly report to?</p> <p>12 A. In HEA?</p> <p>13 Q. Uh-huh. You mentioned that he had a</p> <p>14 line --</p> <p>15 A. Yes.</p> <p>16 Q. -- of authority that included Mr. Kwak.</p> <p>17 A. And Mr. Kwak is no longer assigned to the</p> <p>18 California office. So he does, but it has since</p> <p>19 changed so -- over time, so I have no idea --</p> <p>20 Q. In 2017 was his direct supervisor</p> <p>21 Mr. Kwak?</p> <p>22 A. Yes, as far as I know -- or knew it at the</p> <p>23 time.</p> <p>ALABAMA COURT REPORTING, INC.</p> <p>www.alabamareporting.com 877.478.DEPO (3376)</p> <p>149:01 Q. And so when you talked about him reporting</p> <p>02 to various HMMA offices, you were talking about</p> <p>03 contractual reports he needed to give, early in</p> <p>04 your deposition?</p> <p>05 A. Yes. Any information or whatever related</p> <p>06 to the contracts that HEA manage.</p>
75	150:16 - 151:04	<p>150:16 Q. Okay. It was just your decision to change</p> <p>17 the mail room hours?</p> <p>18 A. Well, just based on feedback I was getting</p> <p>19 from HMMA team members as related -- them trying</p>

		<p>20 to send mail, send packages. And there were times</p> <p>21 that HMMA's finance department was late getting</p> <p>22 out payroll checks or the W-2s, and it would</p> <p>23 require the mail room staff to stay past their</p> <p>ALABAMA COURT REPORTING, INC.</p> <p>www.alabamareporting.com 877.478.DEPO (3376)</p> <p>151:01 normal hours. So just the various feedback, it</p> <p>02 was just best that we modified it, yes.</p> <p>03 Q. You changed the hours?</p> <p>04 A. Yes.</p>
76	151:19 - 151:21	<p>151:19 MS. BROWN: Object to form.</p> <p>20 MR. REDMOND: Object to form.</p> <p>21 MR. MILLER: Object to form.</p>
77	152:04 - 152:06	<p>152:04 MR. REDMOND: Object to form.</p> <p>05 MR. MILLER: Object to the form.</p> <p>06 MS. BROWN: Object to the form.</p>
78	152:20 - 152:22	<p>152:20 MS. BROWN: Object to the form.</p> <p>21 MR. MILLER: Object to the form.</p> <p>22 MR. REDMOND: Same objection.</p>
79	155:19 - 155:19	155:19 MS. BROWN: Object to form.
80	155:23 - 155:23	155:23 MS. BROWN: Object to form.